

## Chapter Two – Context for Analysis of options

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1. The same number of overhead positions will be needed in the future for incidents.
2. To efficiently use private wildland fire services personnel, all agencies must develop a common definition of inherent government functions and standardize payment rates and contracts. . See the Federal Wildand Fire Agencies Reserve program on page 16.
3. All NIMO positions are funded and staffed for 260 days. All volunteer militia, state and local government and private wildland fire services positions are funded and planned based on 60 days of complex incident assignments.
4. The cost of all positions is based on \$500.00 per day. This over-programmed rate for NIMO and volunteer militia positions would cover any funding shortages caused by the \$500.00 daily rate for state, local government and private wildland fire service employees and administrative costs for NIMO employees.
5. All NIMO Incident Management Teams will respond to non-wildland fire incidents and can meet the full magnitude of Department of Homeland Security assignments. Geographical Area sponsored Incident Management Teams will respond to local State Response Plan emergency assignments.
6. The use of the term “contract” is all-inclusive and comprises: rehired annuitants, Administratively Determined hired (ADs), and formal contracted wildland fire services. Agreements would be established with state and local governments who elect to provide personnel.
7. All federal agencies will use the same incident qualification and certification system (NWCG 310-1). Private wildland specifications will require similar equivalent NWCG 310-1 standards.
8. There are no longer federal agency savings because suppression expenditures are now being totally covered by the agencies out of appropriated funds.
9. Private wildland fire services, state and local government and federal volunteer militia members will be in training or on assignment 60 days per year.
10. Option one in Chapter four is the baseline for measurement of costs, effectiveness and efficiency.
11. All options, other than Option 1, will use incident size, type and complexity to determine IMT configuration for the response to an incident. Long IMT’s will no longer respond to all incidents.

12. National Response Plan direction will be met by both U.S. Department of Agriculture and the U.S. Department of the Interior.
13. Geographic or sub-geographic areas will establish Type 3 Interagency Management Teams consistent with the direction and Standards in the Inter-agency Fire Operations Handbook, Chapter 10, Incident Management organizations and standards. This is in line with the new direction from DHS to local government.
14. Excellent leadership must be exhibited to establish any NIMO alternative.
15. Service First “*Concept of Operations*” will be used with any selected NIMO alternative. Will follow the Service First Concepts in the development of standard direction policies and guidelines.
16. Incident Management Teams, modules staffed by agency rehires, or the private wildland fire services may be used for selected non-wildland fire incidents. These same resources may help agencies such as FEMA, APHIS, NASA and the Department of Homeland Security for development of their own Incident Management Teams. This would enable agency personnel to stay home to pursue their regular jobs.
17. The use of rehired annuitants will maximize the use of retirees to fill positions that the agencies and private wildland fire services are unable to fill.
18. Volunteer militia are used in all options. Commitment to incident management support and training will be required. This would include recognizing potential fire management “stars” who would receive accelerated training, mentoring and job experience to advance rapidly in the fire program.
19. We must offer incentives to personnel for participating on Incident Management Teams. These include:
  - Offer cash incentives for committing to three years as a member of an Incident Management Team.
  - Change career development and promotion selection processes to require a background in incident management to be considered, especially for line positions.
  - Change current pay rules to allow overtime from incident participation to count toward the “high three” in computing retirement annuity.
20. Agency policy must be changed so that all employees are required to participate or support the incident management program.
21. Offer federal funded Intergovernmental Personnel Act (IPA) positions to state and local government agencies to fund their involvement in NIMO.

22. To efficiently use private wildland fire services, agency attitudes and processes for contracting must dramatically change.
  23. Finance/Administrative Sections on Incident Management Teams will provide much of the NIMO administrative support.
  24. Working agreements will be used for Incident Management Team members to help evaluate performance for non-incident assignment work.
  25. Use Incident Management Teams and selected overhead from Canada, New Zealand, and Australia for training assignments every year to reduce “start-up time” when these resources are needed in severe and extreme wildland fire years. This practice would also include an exchange/reciprocal agreement for United States mobilization with Canada, New Zealand, and Australia.
  26. Assist state and local government through the use of NFPA 1051, 1561 or NWCG 310-1 qualification standards in training to help provide qualified local employees in incident management.
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## CHAPTER THREE – ISSUES AND CONCERNS

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*“Agencies should provide incentives to increase the proportion of their own employees who participate in some adjunct firefighting or fire-support activities related to large-fire suppression although their primary jobs are not firefighting.”*

**The National Academy of Public Administration report  
Wildfire Suppression: Strategies for Containing Costs  
September 2002**

In the beginning of the analysis process, the following issues and concerns were considered and addressed by this study’s Management Options Team and Task Group.

- The increased complexity of local resource management and changing employee values has lead to the unavailability of qualified personnel for Incident Management Teams.
- The existing workforce and the skills mix of that workforce are insufficient to address changing fire management priorities and increased fire management complexities.
- The local ability to effectively supervise initial and extended attack.
- Personnel are needed for complex incident management at the same time they are needed at the home unit for fire and land and resource management responsibilities.
- Perceptions of some Agency Administrators supporting complex incident management objectives and achieving land and resource management targets are mutually exclusive.
- The current highly decentralized organizations and differing land and natural resource management agency cultures.
- The integration of fire management with other land and resource management activities.
- The ability of federal natural resource management agencies to redeem their land and natural resource management role. The linkage to all federal land management agencies’ land and resource management mission is simply too important to divorce aspects of fire management and fire use from these agencies.

- The ability to provide qualified individuals to meet complex incident management needs.
- The need for training efficiency and consistency and a certification system to meet complex incident management needs.
- Determining the capability of agencies to meet future management and support of the National Response Plan.
- The ability to resolve the current limited number of Incident Management Teams for an expanding number of incidents.
- Fire suppression responsibility is becoming more and more complex, thus more costly. Suppression costs have trended upward sharply from the mid-90s to today. Over the last five years, this expansion of suppression costs has increased 200 percent.
- There are increased accountability requirements of Incident Management Teams and Agency Administrators in the area of complex incident management.
- Ensuring the safety of responders and the public.
- Increased wildland fire complexity due to accumulation of hazardous fuel across the country—coupled with an ever-increasing wildland-urban interface.
- Determining the authorities, responsibilities, liabilities, and reimbursements of an interagency National Incident Management Organization solution.
- What is the adaptability of agencies to accept organizational change?
- The administration, Office of Management and Budget (OMB), General Accounting Office (GAO), and the public, all demand a more cost effective approach to fire management.
- The severity and complexity of wildland fires are increasing across the nation. Mega-fires are an emerging issue.
- Complex wildland fire incidents have evolved into all-risk incidents (HazMat, evacuations, search and rescue, structure fires, etc.).
- The ability to maintain land and natural resource agency focus in wildland fire incidents.
- The conflicts of jurisdictional authorities and responsibilities in the interagency environment.

- The ability to utilize local non-wildland fire agencies/services to support Incident Management Teams specifically for the T3 Incident Management Teams.
- Organizational options may require multiple Employee-Union approvals.
- All options other than the current option will involve agency policy changes and may require significant human resource commitments.
- Interagency wildland Incident Management Teams are heavily relied upon for non-wildland fire incidents and support of the current Federal Response Plan.
- Few career incentives encourage participation in complex incident management.
- Parents have childcare concerns, as well as other community interests that affect availability for complex incident management assignments.
- Incident management activities are not included in position descriptions or performance evaluations.

## CHAPTER FOUR – ORGANIZATIONAL OPTIONS

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Options evaluated for the Complex Incident Management Organization Study are:

**Option 1 - Current Organization** – The current organization includes:

16 Type I “long” National Interagency Incident Management Teams sponsored by the nine geographic areas. These teams are on both a national and geographic rotation. The composition of these teams is approximately 75% Federal and 25% State, Local and Private Wildland Fire Services.

35 Type II “long” Interagency geographic Incident Management Teams which are sponsored by geographic or sub-geographic areas. These teams are on geographic rotation. The composition of these teams are approximately 75% Federal and 25% State, Local and Private Wildland Fire Services.

4 “short” Interagency Fire Use Management Teams sponsored by the National MAC Group and on national rotation.

4 National Area Command Teams of four people each sponsored by the National MAC Group and on national rotation.

The long teams are comprised of an average 60 people, including trainees. The short teams average 10 people. All of these teams are staffed with employees who are part of the volunteer militia system and have other full time jobs with their agencies.

There is no standard team tenure or selection process for these 55 incident management teams.

**Option 2 – Enhanced Current Organization**

Option 2 maintains the incident management team structure described in Option 1 but with 65 IMTs, 45 type 2 and 20 type 1 teams except FUMT workload is now part of 65 interagency IMTs. The need for 65 IMTs comes from the needs assessment found in Appendix A with the following agency policy changes:

- Federal agency’s require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element). Employees who want to continue with IMT participation will be supported by their agency and local Agency Administrator.

Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.

Comment:

Incident Management participation is included in annual work planning. Work "missed" while an employee is away from the local unit does not get accomplished.

### **Option 3 – NIMO – 50% Permanently Staffed**

For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

This option reduces the number of Incident Management Teams to 60 with 40 type 2 and 20 type 1 teams. 30 team members are NIMO employees with the remainder of the team positions filled with volunteer militia, State and Local government, and Private Wildland Fire Service employees. Area Command Team members (4/team) are NIMO employees.

All three Federal Agency policy changes described in Option 2:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.
- Incident Management participation is included in annual work planning. Work "missed" while an employee is away from the local unit does not get accomplished.

Comment:

### **Option 4 – NIMO – 10 Permanent employees/team**

For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

This option has 60 Incident Management Teams with 40 type 2 and 20 type 1 teams using the NWCG "short team" configuration (10/team) as permanent employees. The remainder of the team positions are filled with volunteer militia, State and Local government, and Private Wildland Fire Service employees. Area Command Team members (4/team) are NIMO employees.



All three Federal Agency policy changes:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.
- Incident Management participation is included in annual work planning. Work "missed" while an employee is away from the local unit does not get accomplished.

Comment:

### Option 5 – Type I IMTs NIMO

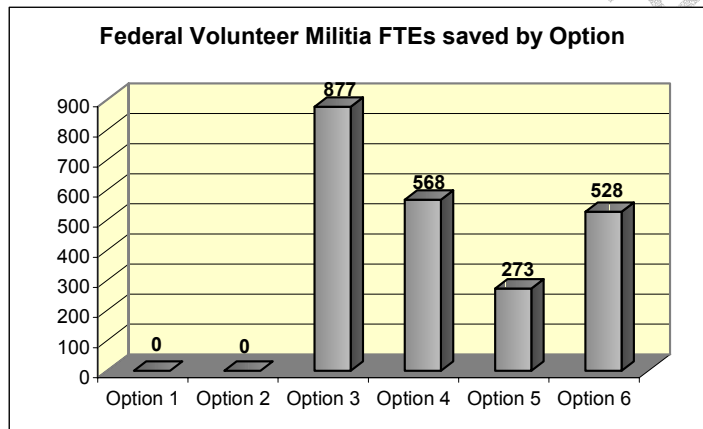
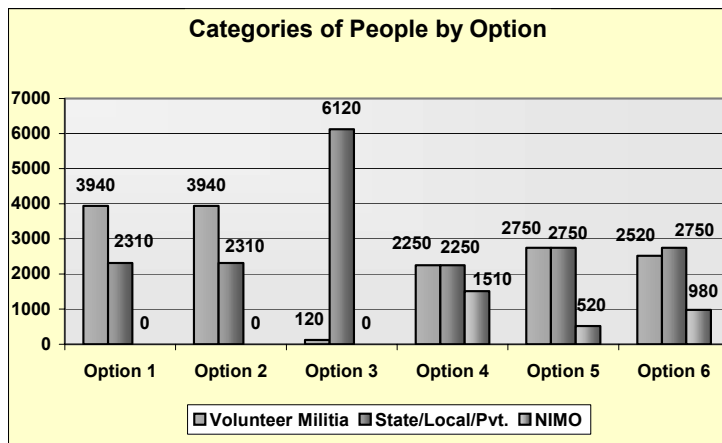
For options 3-5, placement of NIMO positions are for example only. In reality the number and types of NIMO staffing can be re-arranged in each option.

This option has 16 Type 1 Incident Management Teams with 60 NIMO employees/team. Area Command Team members (4/team) are NIMO employees. 44 Type 2 Incident Management Teams are provided by the geographic areas and are staffed by volunteer militia, State and Local government, and Private Wildland Fire Service employees (60/team).

All three Federal Agency policy changes:

- Federal agency's require all employees to commit a minimum of three years for 60 days per year of their career to participate in incident management support. . Agency Administrators will be held accountable for meeting the requirement through annual performance ratings (will be included as a critical element).
- Local Type 3 IMT will be established by the standards in the Interagency Fire Operations Handbook, Chapter 10, Incident Management organizations will be required. Improving and standardizing training and supervision requirements for these organizations will be necessary.
- Incident Management participation is included in annual work planning. Work "missed" while an employee is away from the local unit does not get accomplished.

Comment:



Paul, I will get some updated charts to you early next week.

The NIMO positions in Options 3,4 and 5 provide additional flexibility to reduce the volunteer militia during non-peak IMT usage periods (October 1 to June 1).

OPTIONS

	Number of IMTs	Number of ACTs	Total FTE's	Volunteer Militia FTE's 60 days/person	Contract, State & local government FTE's	NIMO FTE's	
1	55	4	1268	950	318	0	
2	65	5	1268	950	318	0	
3	60	5	2474	327	327	1820	
4	60	5	1616	498	498	620	
5	60	5	1772	396	396	980	

DRAFT #6

***The success of all Options requires National MAC oversight and management of rotation and use of non-NIMO personnel to ensure compliance with a 60 day commitment.***

**The cost rational for each option follows:**

**OPTION 1**

This option includes the current 51 type I and Type II interagency IMTs. Each IMT will have an average of 120 overhead when on assignment. Also included are the current 4 Fire Management Use IMTs. They each have 10 overhead when on assignment. There are also 4 Area Command Teams with 4 people per team. Volunteer militia (VM) make up 75% of all teams and private, state and local (PSL) government make up the other 25%

90VM/team x 51 IMTs =	4590 people
30 PSL/team x 51 IMTs =	1534 people
3VM/team x 4 ACTs =	12 people
1 PSL/team x 4 ACT =	4 people
8 VM/team x 4 FMUTs =	32 people
2 PSL/team x 4 FMUTs =	8 people
TOTAL	6192 people

10 year average = 329,280 IMT overhead days per year

329,280 = 54 days per year on assignment  
6192

**COSTS and FTEs**

VM = 4634 people x 54 days x \$500/day = \$125.0mm  
PSL = 1542 people x 54 days x \$500/day = \$42.0mm  
**\$167.0mm**

**VM = 4634 x 54 days = 950 FTEs**  
**260**

**PSL = 1542 x 54 days = 318 FTEs**  
**260**

**OPTION 2**

This option includes the current 65 type I and Type II interagency IMTs of 120 people which are 75% VM and 25% PSL. The 65 IMTs are based on the 2004 needs analysis which as the objective of non-NIMO overhead not being assigned more than 60 days per year. The workload includes 4 Fire Management Use IMTs. There are also 5 Area Command Teams with 4 people per team.

90VM/team x 65 IMTs =	5850 people
30 PSL/team x 65 IMTs =	1950 people
3VM/team x 5ACTs =	15 people
1 PSL/team x 5ACT =	5 people
TOTAL	7820 people

10 year average = 329,280 IMT overhead days per year

$\frac{329,280}{7820} = 42 \text{ days per year on assignment}$

#### COSTS and FTEs

VM = 5865 people x 42 days x \$500/day = \$123.0mm  
 PSL = 1955 people x 42 days x \$500/day = \$41.0mm  
**\$164.0mm**

VM =  $\frac{4634 \times 42 \text{ days}}{260} = 950 \text{ FTEs}$

PSL =  $\frac{1542 \times 42 \text{ days}}{260} = 318 \text{ FTEs}$

#### OPTION 3

This option includes the current 60 type I and Type II interagency IMTs. Each IMT will have an average of 30 NIMO, 45 VM and 45 PSL overhead when on assignment. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. The 2004 needs analysis displays an average of 196 IMT assignments per year and 25% or 49 of these assignments occur from October to May, these 49 assignments will be fully staffed by NIMO personnel.

30 NIMO/team x 60 IMTs =	1800 people
45VM/team x 60 IMTs =	2700 people x 75% = 2025
45 PSL/team x 60 IMTs =	2700 people x 75% = 2025
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5870 people

10 year average = 329,280 IMT overhead days per year

49 assignments by 100% NIMO = 46 days/year

147 assignments by 60 mixed IMTs = 42 days/each (NIMO employees assigned 88 days/year)

#### COSTS and FTEs

NIMO = 260 days x \$500.day x 1820 people = \$237.0mm  
 VM = 2025 people x 42 days x \$500/day = \$43.0mm

$$\text{PSL} = 2025 \text{ people} \times 42 \text{ days} \times \$500/\text{day} = \underline{\$43.0\text{mm}}$$
$$\mathbf{\$323.0\text{mm}}$$

$$\text{NIMO} = \frac{260 \text{ days} \times 1820 \text{ people}}{260} = 1820 \text{ FTEs}$$

$$\text{VM} = \frac{2025 \times 42 \text{ days}}{260} = 327 \text{ FTEs}$$

$$\text{PSL} = \frac{2025 \times 42 \text{ days}}{260} = 327 \text{ FTEs}$$

#### **OPTION 4**

This option includes the current 60 type I and Type II interagency IMTs. Each IMT will have an average of 10 NIMO, 55 VM and 55 PSL overhead when on assignment. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. Fifty percent of the 25% of assignments occur from October to May and will be staffed by NIMO personnel.

10 NIMO/team x 60 IMTs =	600 people
55VM/team x 60 IMTs =	3300 people x 80% = 2640
55 PSL/team x 60 IMTs =	3300 people x 80% = 2640
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5900 people

25 assignments by 100% NIMO = 70 days/year/person

171 assignments by 60 mixed IMTs = 49days/each (NIMO employees assigned 119 days/year)

COSTS and FTEs

$$\text{NIMO} = 260 \text{ days} \times \$500/\text{day} \times 620 \text{ people} = \$81.0\text{mm}$$

$$\text{VM} = 2640 \text{ people} \times 49\text{days} \times \$500/\text{day} = \$65.0\text{mm}$$

$$\text{PSL} = 2640 \text{ people} \times 49\text{days} \times \$500/\text{day} = \underline{\$65.0\text{mm}}$$
$$\mathbf{\$211.0\text{mm}}$$

$$\text{NIMO} = \frac{260 \text{ days} \times 620 \text{ people}}{260} = 620 \text{ FTEs}$$

$$\text{VM} = \frac{2640 \times 49 \text{ days}}{260} = 498 \text{ FTEs}$$

$$\text{PSL} = \frac{2640 \times 49 \text{ days}}{260} = 498 \text{ FTEs}$$

#### **OPTION 5**

This option includes 16 IMTs of 60 NIMO type I and Type II interagency IMTs. Each IMT will have an 30 VM and 30 PSL overhead and 44 IMTs of 60 VM and 50 PSL overhead. The option 1 4 Fire Management Use IMTs have been included. There are 5 Area Command Teams with 4 NIMO people per team. 25% of all assignments occur from October to May and will be staffed only by NIMO personnel.

60 NIMO/team x 16 IMTs =	960 people
30 VM/team x 16 IMTs =	480 people x 75% = 360
30 PSL/Team x 16 IMTs =	480 people x 75% = 360
60 VM/team x 44 IMTs =	2640 people x 75% = 1980
60 PSL/team x 44 IMTs =	2640 people x 75% = 1980
4 NIMO/team x 5 ACTs =	20 people
TOTAL	5660 people

49 assignments by 100% NIMO = 86 days/year/person

147 assignments by 60 mixed IMTs = 44 days/each (NIMO employees assigned 130 days/year)

#### COSTS and FTEs

NIMO = 260 days x \$500/day x 980 people = \$127.0mm

VM = 2340 people x 44 days x \$500/day = \$51.0mm

PSL = 2340 people x 44 days x \$500/day = \$51.0mm  
**\$229.0mm**

**NIMO =  $\frac{260 \text{ days} \times 980 \text{ people}}{260} = 980 \text{ FTEs}$**

**VM =  $\frac{2025 \times 44 \text{ days}}{260} = 396 \text{ FTEs}$**

**PSL =  $\frac{2025 \times 44 \text{ days}}{260} = 396 \text{ FTEs}$**